STATEMENT OF BASIS

as required by LAC 33:IX.3109 for a draft permit for which a fact sheet under LAC 33:IX.3111 is not prepared, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0038601; AI 38522; PER20070001** to discharge to waters of the **State of Louisiana** as per LAC 33:IX.2311.

The **permitting authority** for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

I. **THE APPLICANT IS:** Concordia Parish Sewerage District #1
Post Office Box 823
Ferriday, LA 71334

II. **PREPARED BY:** Todd Franklin

DATE PREPARED: January 25, 2008

III. **PERMIT ACTION:** reissue LPDES permit LA0038601, AI 38522; PER20070001

LPDES complete application received: September 4, 2007

EPA has not retained enforcement authority.

Previous LPDES permit effective: November 1, 2002
Previous LPDES permit expires: October 31, 2007

IV. **FACILITY INFORMATION:**

A. The application is for the discharge of treated sanitary wastewater from a publicly owned treatment works serving the Town of Ridgecrest and Concordia Sewerage District #1.

B. The permit application does not indicate the receipt of industrial wastewater.

C. The facility is located at the end of Vidalia Drive in Ridgecrest, Concordia Parish.

Front Gate Coordinates: Latitude 31° 35' 51" North
Longitude 91° 31' 58" West

D. The treatment facility consists of a primary and secondary aeration and settling ponds with chlorine disinfection.

E. Outfall 001

Discharge Location: Latitude 31° 35' 51" North
Longitude 91° 31' 58" West

Description: treated sanitary wastewater

Design Capacity: 0.60 MGD

Type of Flow Measurement which the facility is currently using: Continuous Recorder

V. RECEIVING WATERS:

The discharge is into an unnamed canal; thence into Red Bayou; thence into Bayou Cocodrie; thence into the Black River in Subsegment 101607 of the Red River Basin. This Subsegment is not listed on the 303(d) list of impaired waterbodies.

The designated uses and degree of support for Subsegment 101607 of the Red River Basin are as indicated in the table below[1/]:

Overall Degree of Support for Segment	Degree of Support of Each Use						
Insufficient Data	Primary Contact Recreation	Secondary Contact Recreation	Limited Aquatic Life and Wildlife Use	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
	N/A	Full	Insufficient Data	N/A	N/A	N/A	N/A

[1/]The designated uses and degree of support for Subsegment 101607 of the Red River Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2004 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

VI. ENDANGERED SPECIES:

The receiving waterbody, Subsegment 101607 of the Red River Basin, is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U. S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 24, 2007, from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

VII. HISTORIC SITES:

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the 'Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits' no consultation with the Louisiana State Historic Preservation Officer is required.

VIII. PUBLIC NOTICE:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

For additional information, contact:

Mr. Todd Franklin
Permits Division
Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

IX. PROPOSED PERMIT LIMITS:

Subsegment 101607, Bayou Cocodrie-Hwy. 15 to Little Cross Bayou, is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

Final Effluent Limits:

OUTFALL 001

Final limits shall become effective on the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
BOD_5	50	10 mg/l	15 mg/l	Limits are set in accordance with the Statewide Sanitary Effluent Limitations Policy (SSELP) for facilities of this treatment type and size.
TSS	75	15 mg/l	23 mg/l	Since there is no numeric water quality criterion for TSS, and in accordance with the current Water Quality Management Plan, the TSS effluent limitations shall be based on a case-by-case evaluation of the treatment technology being utilized at a facility. Therefore, a Technology Based Limit has been established through Best Professional Judgement for the type of treatment technology utilized at this facility.

Other Effluent Limitations:

1) **Fecal Coliform**

The discharge from this facility is into a water body which has a designated use of Secondary Contact Recreation. According to LAC 33:IX.1113.C.5.b, the fecal coliform standard for this water body is 2,000 colonies/100 ml. However, the previous permit contained effluent limitations for primary contact recreation of 200 colonies/100 ml (Monthly Average) and 400 colonies/100 ml (Weekly Average). Therefore, these limits shall continue in the renewed permit

2) **pH**

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C., the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.

3) **Solids and Foam**

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

X. PREVIOUS PERMITS:

LPDES Permit No. LA0038601: Effective: November 1, 2002
Expires: October 31, 2008

Effluent Characteristic	Discharge Limitations		Monitoring Requirements	
	Monthly Avg.	Weekly Avg.	Measurement Frequency	Sample Type
Flow	Report (MGD)	Report (MGD)	Continuous	Recorder
BOD_5	50 lbs/day / 10 mg/l	15 mg/l	1/week	3 Hr Comp
TSS	75 lbs/day / 15 mg/l	23 mg/l	1/week	3 Hr Comp
Fecal Coliform Colonies/100 ml	200	400	1/week	Grab
pH	Within the Range of 6.0 su – 9.0 su		1/week	Grab

XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:

A) **Inspections**

A review of the files indicates that no recent inspections have been performed for this facility.

B) **Compliance and/or Administrative Orders**

A review of the files indicates that no recent enforcement actions have been administered against this facility.

C) **DMR Review**

A review of the discharge monitoring reports for the period beginning October 2005 through September 2007 has revealed the following violations:

Parameter	Outfall	Period of Excursion	Permit Limit	Reported Quantity
BOD_5, Monthly Avg.	001	October 2005	10 mg/l	14.0 mg/l
TSS, Monthly Avg.	001	October 2005	15 mg/l	27.0 mg/l
TSS, Weekly Avg.	001	October 2005	23 mg/l	27.0 mg/l
BOD_5, Monthly Avg.	001	November 2005	10 mg/l	21.7 mg/l
BOD_5, Weekly Avg.	001	November 2005	15 mg/l	21.7 mg/l
TSS, Monthly Avg.	001	November 2005	15 mg/l	42.3 mg/l
TSS, Weekly Avg.	001	November 2005	23 mg/l	42.3 mg/l
BOD_5, Monthly Avg.	001	December 2005	10 mg/l	13.3 mg/l
TSS, Monthly Avg.	001	December 2005	15 mg/l	21.8 mg/l
BOD_5, Monthly Avg.	001	January 2006	10 mg/l	13.0 mg/l
TSS, Monthly Avg.	001	January 2006	15 mg/l	44.8 mg/l
TSS, Weekly Avg.	001	January 2006	23 mg/l	44.8 mg/l
BOD_5, Monthly Avg.	001	February 2006	10 mg/l	16.7 mg/l
BOD_5, Weekly Avg.	001	February 2006	15 mg/l	16.7 mg/l
TSS, Monthly Avg.	001	February 2006	15 mg/l	68.2 mg/l
TSS, Weekly Avg.	001	February 2006	23 mg/l	68.2 mg/l
Fecal Coliform, Monthly Avg.	001	February 2006	200 cfu/100 ml	2,700.0 cfu/100 ml
Fecal Coliform, Weekly Avg.	001	February 2006	400 cfu/100 ml	2,700.0 cfu/100 ml
BOD_5, Monthly Avg.	001	March 2006	10 mg/l	19.3 mg/l
BOD_5, Weekly Avg.	001	March 2006	15 mg/l	19.3 mg/l
TSS, Monthly Avg.	001	March 2006	15 mg/l	44.8 mg/l
TSS, Weekly Avg.	001	March 2006	23 mg/l	44.8 mg/l
Fecal Coliform, Monthly Avg.	001	March 2006	200 cfu/100 ml	720.0 cfu/100 ml
Fecal Coliform, Weekly Avg.	001	March 2006	400 cfu/100 ml	720.0 cfu/100 ml
BOD_5, Monthly Avg.	001	April 2006	10 mg/l	29.0 mg/l
BOD_5, Weekly Avg.	001	April 2006	15 mg/l	29.0 mg/l
TSS, Monthly Avg.	001	April 2006	15 mg/l	49.8 mg/l
TSS, Weekly Avg.	001	April 2006	23 mg/l	49.8 mg/l
BOD_5, Monthly Avg.	001	May 2006	10 mg/l	12.3 mg/l
TSS, Monthly Avg.	001	May 2006	15 mg/l	16.0 mg/l
BOD_5, Monthly Avg.	001	June 2006	10 mg/l	12.9 mg/l
BOD_5, Monthly Avg.	001	July 2006	10 mg/l	19.8 mg/l
BOD_5, Weekly Avg.	001	July 2006	15 mg/l	19.8 mg/l
TSS, Monthly Avg.	001	July 2006	15 mg/l	23.2 mg/l
TSS, Weekly Avg.	001	July 2006	23 mg/l	23.2 mg/l
BOD_5, Monthly Avg.	001	August 2006	10 mg/l	13.3 mg/l
BOD_5, Monthly Avg.	001	September 2006	10 mg/l	14.8 mg/l
BOD_5, Monthly Avg.	001	October 2006	10 mg/l	11.1 mg/l
TSS, Monthly Avg.	001	October 2006	15 mg/l	25.8 mg/l
TSS, Weekly Avg.	001	October 2006	23 mg/l	25.8 mg/l
BOD_5, Monthly Avg.	001	November 2006	10 mg/l	12.0 mg/l
TSS, Monthly Avg.	001	November 2006	15 mg/l	24.0 mg/l
TSS, Weekly Avg.	001	November 2006	23 mg/l	24.0 mg/l
BOD_5, Monthly Avg.	001	December 2006	10 mg/l	12.7 mg/l
TSS, Monthly Avg.	001	December 2006	15 mg/l	18.5 mg/l
BOD_5, Monthly Avg.	001	January 2007	10 mg/l	13.4 mg/l
TSS, Monthly Avg.	001	January 2007	15 mg/l	32.8 mg/l
TSS, Weekly Avg.	001	January 2007	23 mg/l	32.8 mg/l
BOD_5, Monthly Avg.	001	February 2007	10 mg/l	15.7 mg/l
BOD_5, Weekly Avg.	001	February 2007	15 mg/l	15.7 mg/l

TSS, Monthly Avg.	001	February 2007	15 mg/l	31.4 mg/l
TSS, Weekly Avg.	001	February 2007	23 mg/l	31.4 mg/l
TSS, Monthly Avg.	001	March 2007	15 mg/l	29.3 mg/l
TSS, Weekly Avg.	001	March 2007	23 mg/l	29.3 mg/l
BOD_5, Monthly Avg.	001	April 2007	10 mg/l	30.6 mg/l
BOD_5, Weekly Avg.	001	April 2007	15 mg/l	30.6 mg/l
TSS, Monthly Avg.	001	April 2007	15 mg/l	59.0 mg/l
TSS, Weekly Avg.	001	April 2007	23 mg/l	59.0 mg/l
BOD_5, Monthly Avg.	001	May 2007	10 mg/l	22.1 mg/l
BOD_5, Weekly Avg.	001	May 2007	15 mg/l	22.1 mg/l
TSS, Monthly Avg.	001	May 2007	15 mg/l	37.5 mg/l
TSS, Weekly Avg.	001	May 2007	23 mg/l	37.5 mg/l
BOD_5, Monthly Avg.	001	June 2007	10 mg/l	24.6 mg/l
BOD_5, Weekly Avg.	001	June 2007	15 mg/l	24.6 mg/l
TSS, Monthly Avg.	001	June 2007	15 mg/l	46.6 mg/l
TSS, Weekly Avg.	001	June 2007	23 mg/l	46.6 mg/l
BOD_5, Monthly Avg.	001	July 2007	10 mg/l	18.3 mg/l
BOD_5, Weekly Avg.	001	July 2007	15 mg/l	18.3 mg/l
TSS, Monthly Avg.	001	July 2007	15 mg/l	31.0 mg/l
TSS, Weekly Avg.	001	July 2007	23 mg/l	31.0 mg/l
BOD_5, Monthly Avg.	001	August 2007	10 mg/l	11.2 mg/l
TSS, Monthly Avg.	001	August 2007	15 mg/l	17.8 mg/l
BOD_5, Monthly Avg.	001	September 2007	10 mg/l	14.1 mg/l

- **The facility did not report any mass/loading values on the DMRs for the entire monitoring period listed above.**
- **According to the previous permit, flow should be monitored by a continuous recorder; however, according to the DMRs throughout the entire monitoring period listed above, flows were measured twice / week.**
- **According to the previous permit, BOD_5, TSS, pH, and Fecal Coliform paratmeters should be monitored once / week; however, according to the DMRs throughout the entire monitored period listed above, these parameters were only monitored once / month.**
- **According to the previous permit, BOD_5 and TSS paratmeters should be collected as a three hour composite; however, according to the DMRs throughout the entire monitored period listed above, these parameters were collected by grab sampling.**

XII. ADDITIONAL INFORMATION:

LDEQ reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future. Additional limitations and/or restrictions are based upon water quality studies and can indicate the need for advanced wastewater treatment. Water quality studies of similar dischargers and receiving water bodies have resulted in monthly average effluent limitations of 5mg/L $CBOD_5$ and 2 mg/L NH_3-N. Prior to upgrading or expanding this facility, the permittee should contact LDEQ to determine the status of the work being done to establish future effluent limitations and additional permit conditions.

Final effluent loadings (i.e. lbs/day) have been established based upon the permit limit concentrations and the design capacity of 0.60 MGD.

Effluent loadings are calculated using the following example:

BOD_5: 8.34 lb/gal x 0.60 MGD x 10 mg/l = 50 lbs/day

At present, the Monitoring Requirements, Sample Types, and Frequency of Sampling as shown in the permit are standard for facilities of flows between 0.50 and 1.00 MGD.

Effluent Characteristics	Monitoring Requirements	
	Measurement Frequency	Sample Type
Flow	Continuous	Recorder
BOD_5	1/week	3 Hr Composite
Total Suspended Solids	1/week	3 Hr Composite
Fecal Coliform Bacteria	1/week	Grab
pH	1/week	Grab

Pretreatment Requirements

Based upon consultation with LDEQ pretreatment personnel, general pretreatment language will be used due to the lack of either an approved or required pretreatment program.

Pollution Prevention Requirements

The permittee shall institute or continue programs directed towards pollution prevention. The permittee shall institute or continue programs to improve the operating efficiency and extend the useful life of the facility. The permittee will complete an annual Environmental Audit Report **each year** for the life of this permit according to the schedule below. The permittee will accomplish this requirement by completing an Environmental Audit Form which has been attached to the permit. All other requirements of the Municipal Wastewater Pollution Prevention Program are contained in Part II of the permit.

The audit evaluation period is as follows:

Audit Period Begins	Audit Period Ends	Audit Report Completion Date
Effective Date of Permit	12 Months from Audit Period Beginning Date	3 Months from Audit Period Ending Date

XIII TENTATIVE DETERMINATION:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in this Statement of Basis.

XIV REFERENCES:

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards," Louisiana Department of Environmental Quality, 2004.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program," Louisiana Department of Environmental Quality, 2004.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, Concordia Parish Sewerage District #1, September 4, 2007.